

Exhibit J

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

| Plaintiffs' Executive Committee for Personal Injury and Death Claims | Plaintiffs' Executive Committee for Commercial Claims |
|---|--|
| Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP | Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR |
| Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC | J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR |

VIA E-MAIL

March 16, 2018

Omar T. Mohammedi, Esq.
Law Firm of Omar T. Mohammedi, LLC
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Woolworth Building
New York, NY 10279

Frederick J. Goetz, Esq.
Goetz & Eckland
615 1st Avenue NE
Suite 425
Minneapolis, MN 55413

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Omar and Fred:

I write on behalf of the Plaintiffs' Executive Committees ("PECs") in response to your March 14, 2018 letter requesting that plaintiffs identify for WAMY those document requests "which plaintiffs contend WAMY's production had been inadequate, incomplete or otherwise deficient." As set forth in the Motion to Compel (ECF No. 3911), plaintiffs maintain that WAMY's responses are significantly deficient as to most, if not all, of plaintiffs' document requests, and offer several important categories of documents as examples of WAMY's failure to provide a full, complete, and organized production of responsive records. Plaintiffs also clearly identify the specific document requests at issue for each of those categories. Your March 14 request for information that is already in your possession is therefore puzzling to us. Nevertheless, without limiting the identification of deficiencies already identified in our motion, plaintiffs are once again providing you with the outstanding document requests specifically identified in the Motion to Compel, including additional document requests that fall within those categories.

Eight Categories of Requested Documents:

- Request Nos. 1-8 from Plaintiffs' Second Set of Document Requests Directed to WAMY-SA.

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Records Concerning Senior Officials of WAMY:

- Request Nos. 52, 53, 60, 62, 65, and 81 from Plaintiffs' First Set of Document Requests Directed to WAMY-SA.
- Request Nos. 23, 24, 25, 33, 40, 52, and 60 from Plaintiffs' First Set of Document Requests Directed to WAMY-INTERNATIONAL.
- Request Nos. 1-8 from Plaintiffs' Fourth Set of Document Requests Directed to WAMY-SA.

Records Concerning WAMY and the Saudi Government:

- Request Nos. 6-9, 29-33, 35, 55, 66, 71-81, 88, and 96 from Plaintiffs' First Set of Document Requests Directed to WAMY-SA.
- Request Nos. 3-6, 28, 41, and 71 from Plaintiffs' First Set of Document Requests Directed to WAMY-INTERNATIONAL.
- Request No. 15 from Plaintiffs' Second Set of Document Requests Directed to WAMY-SA.
- Request No. 7 from Plaintiffs' Fourth Set of Document Requests Directed to WAMY-SA.

Records Concerning WAMY's Governing Bodies and Committees:

- Request Nos. 51, 52, and 53 from Plaintiffs' First Set of Document Requests Directed to WAMY-SA.
- Request No. 10 from Plaintiffs' Second Set of Document Requests Directed to WAMY-SA.

Records Concerning Benevolence International Foundation:

- Request Nos. 82-89 and 91-92 from Plaintiffs' First Set of Document Requests Directed to WAMY-SA.
- Request Nos. 54-57 from Plaintiffs' First Set of Document Requests Directed to WAMY-INTERNATIONAL.
- Request Nos. 45-48 from Plaintiffs' Third Set of Document Requests Directed to WAMY-SA.

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Records Concerning Abdullah bin Laden:

- Request Nos. 23-25 from Plaintiffs' First Set of Document Requests Directed to WAMY-SA.
- Request Nos. 9-12 from Plaintiffs' First Set of Document Requests Directed to WAMY-INTERNATIONAL.

Records Concerning the TWRA and El Fatih Hassanein:

- Request Nos. 82-89 from Plaintiffs' First Set of Document Requests Directed to WAMY-SA.
- Request Nos. 2-13 from Plaintiffs' Third Set of Document Requests Directed to WAMY-SA.

Records Concerning Hamas:

- Request Nos. 26-28 from Plaintiffs' First Set of Document Requests Directed to WAMY-SA.
- Request Nos. 16-18 from Plaintiffs' First Set of Document Requests Directed to WAMY-INTERNATIONAL.
- Request Nos. 16-19 from Plaintiffs' Third Set of Document Requests Directed to WAMY-SA.

Records Concerning WAMY's Support for other Terrorist Organizations:

- Request Nos. 20-22 from Plaintiffs' First Set of Document Requests Directed to WAMY-SA.
- Request Nos. 23-25 from Plaintiffs' Third Set of Document Requests Directed to WAMY-SA.

Records Concerning Investigations and Arrests of WAMY Personnel and Raids and Closures of WAMY Branch Offices:

- Request Nos. 13-19, 29, 31, 35, 89, 97, 102, and 103 from Plaintiffs' First Set of Document Requests Directed to WAMY-SA.
- Request Nos. 7-8 from Plaintiffs' First Set of Document Requests Directed to WAMY-INTERNATIONAL.

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- Request Nos. 12-13 from Plaintiffs' Second Set of Document Requests Directed to WAMY-SA.
- Request Nos. 14-15 from Plaintiffs' Third Set of Document Requests Directed to WAMY-SA.

Records or Lists Identifying WAMY Employees in Bosnia, the Philippines, Pakistan, Sudan, and Kashmir:

- Request No. 11 from Plaintiffs' Second Set of Document Requests Directed to WAMY-SA.

Records Concerning WAMY's Application to the United Nation's Committee on Non-Governmental Organizations:

- Request Nos. 33-36 from Plaintiffs' Third Set of Document Requests Directed to WAMY-SA.

Records Concerning WAMY's Publications, Including Al Mustaqbal Al Islami ("Islamic Future"):

- Request No. 48 from Plaintiffs' First Set of Document Requests Directed to WAMY-SA.

Records Concerning WAMY's Relationship with Guantanamo Bay Detainees:

- Request Nos. 12-13 from Plaintiffs' Second Set of Document Requests Directed to WAMY-SA.
- Request Nos. 31-32 from Plaintiffs' Third Set of Document Requests Directed to WAMY-SA.

Records Concerning WAMY-Canada:

- Request Nos. 37-51 from Plaintiffs' Third Set of Document Requests Directed to WAMY-SA.

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Plaintiffs reiterate our request that to the extent that WAMY takes the position that plaintiffs are not entitled to documents or categories of documents at issue in plaintiffs' Motion to Compel, that WAMY please identify those in advance of Monday's meet-and-confer and explain the grounds for WAMY's position. Further, to the extent that WAMY claims to have fully complied and produced all responsive documents falling within any of the identified categories in plaintiffs' Motion to Compel, please identify those circumstances as well.

Sincerely,

COZEN O'CONNOR



By: J. Scott Tarbutton, on behalf of the PECs

cc: Members of Plaintiffs' Executive Committee (via E-Mail)